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*Attorneys for ABN AMRO Bank (Ireland) Ltd.
(f/k/a Fortis Prime Fund Solutions Bank
(Ireland) Ltd.) (n/k/a ABN AMRO Retained
Custodial Services (Ireland) Limited) and
ABN AMRO Custodial Services (Ireland) Ltd.
(f/k/a Fortis Prime Fund Solutions Custodial
Services (Ireland) Ltd.)*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO BANK (IRELAND), LTD, (f/k/a
FORTIS PRIME FUND SOLUTIONS BANK
(IRELAND) LIMITED) and

ABN AMRO CUSTODIAL SERVICES (IRELAND),
LTD (f/k/a FORTIS PRIME FUND SOLUTIONS
CUSTODIAL SERVICES (IRELAND) LTD.),
Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05355 (SMB)

DEFENDANTS' WITHDRAWAL OF MOTION TO SEAL

PLEASE TAKE NOTICE THAT Defendants ABN AMRO Bank (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Bank (Ireland) Ltd.) (n/k/a ABN AMRO Retained Custodial Services (Ireland) Limited) (“ABN Ireland”) and ABN AMRO Custodial Services (Ireland) Limited (f/k/a Fortis Prime Fund Solutions Custodial Services (Ireland) Ltd.) (“ABN Custodial”) and together with ABN Ireland, the “Defendants”), by and through undersigned counsel, hereby withdraw their Motion to File Under Seal Portions of their Memorandum of Law in Opposition to Trustee’s Motion for Leave to File Second Amended Complaint and Accompanying Declaration and Exhibits (the “Motion to Seal”). ECF No. 18682. The Defendants also filed their Memorandum of Law in Opposition to Trustee’s Motion for Leave to File Second Amended Complaint (the “Opposition”) (ECF No. 18683) and the Declaration of Thomas J. Giblin in Support of Defendants’ Opposition to Trustee’s Motion for Leave to File Second Amended Complaint and accompanying exhibits (ECF No. 18684) (the “Declaration”) under seal pending the Motion to Seal, with redacted versions filed on the public docket. The Motion to Seal was granted by this Court. ECF No. 18695. For the reasons explained in the Defendants’ and Trustee’s joint letter to the Court (Case No. 10-05355, ECF No. 172), Defendants voluntarily withdraw the Motion to Seal, and will file unredacted versions of the Opposition and the Declaration and accompanying exhibits.

Dated: April 29, 2019
New York, New York

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Thomas J. Giblin

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